

USA: Susan Fairchild
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UNITED STATES DISTRICT COURT
 for the
Eastern District of Michigan

United States of America

v.
Gamaliel MEDINA-SANCHEZ

Case No. Case: 2:25-mj-30019
 Assigned To : Unassigned
 Assign. Date : 1/27/2025
 Description: CMP USA V.
 MEDINA-SANCHEZ (DJ)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 23, 2025 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

Title 8, United States Code, Section 1326(a)

Unlawful Re-entry after Removal from the United States

This criminal complaint is based on these facts:

On or about January 23, 2025, in the Eastern District of Michigan, Southern Division, Gamaliel MEDINA-SANCHEZ, an alien from Mexico was found in the United States after having been denied admission, excluded, deported, and removed therefrom on or about March 31, 2020, at or near Brownsville, Texas and not having obtained the express consent of the Attorney General of the United States or the Secretary of Homeland Security to re-apply for admission thereto; in violation of Title 8, United States Code, Section 1326 (a).

Continued on the attached sheet.



Complainant's signature

Brian Cox, BPA

Printed name and title



Judge's signature

Hon. Kimberly Altman, U.S. Magistrate Judge

Printed name and title

Sworn to before me and signed in my presence
 and/or by reliable electronic means.

Date: January 27, 2025

City and state: Detroit, MI

AFFIDAVIT

I, Brian Cox, declare the following under penalty of perjury:

1. I am a Border Patrol Agent with the United States Department of Homeland Security, United States Border Patrol. I have been employed in this capacity since August 2010. Currently, I am assigned to the Detroit Sector Anti-Smuggling Unit. The facts set forth herein are based upon my personal knowledge as well as information provided by other law enforcement officers to include Border Patrol Agents and record checks of law enforcement databases. I have also reviewed material from the official Immigration file and system automated data relating to Gamaliel MEDINA-SANCHEZ, which reveals the following:
2. MEDINA-SANCHEZ is a sixty-year-old male, native and citizen of Mexico, who last entered the United States at or near an unknown place, on or about an unknown date without being admitted, inspected, or paroled by an Immigration Officer.
3. On or about August 5, 1994, MEDINA-SANCHEZ was ordered deported in absentia from the United States by an Immigration Judge located in Chicago, IL.
4. On or about July 1, 1999, MEDINA-SANCHEZ was arrested for Domestic Violence in violation of Michigan Compiled Law 750.812 and Assault with a Dangerous Weapon in violation of Michigan Compiled Law 750.82. On September 16, 1999, MEDINA-SANCHEZ was convicted of Domestic Violence and the lesser charge of Attempted Assault with a Dangerous Weapon and was placed on 3 years' probation.
5. On or about July 31, 2004, MEDINA-SANCHEZ was arrested by U.S. Border Patrol Agents near El Paso, Texas. At that time, MEDINA-SANCHEZ was processed as a reinstate and served with an I-871 Notice of Intent/Decision to Reinstate a Prior Order using a first removal date of August 5, 1994. The I-871 stated MEDINA-SANCHEZ had been identified as an alien who on February 24, 2004, voluntarily departed the United States. A thorough review of the alien file produced no evidence of self-removal. MEDINA-SANCHEZ was charged in the United States District Court, Western District of Texas with 8 U.S.C. § 1325. MEDINA-SANCHEZ pleaded guilty and was sentenced to nineteen days' time-served.

MEDINA-SANCHEZ was removed from the United States to Mexico on August 26, 2004.

6. On or about September 18, 2009, MEDINA-SANCHEZ was arrested by the Detroit ERO Fugitive Operations team as he approached his residence at 4820 Toledo Street in Detroit, MI. MEDINA-SANCHEZ was processed as a reinstate and served with an I-871 Notice of Intent/Decision to Reinstate a Prior Order. MEDINA-SANCHEZ was removed from the United States to Mexico on September 29, 2009 at Laredo, TX.
7. On or about March 4, 2010, MEDINA-SANCHEZ, was arrested near Laredo, Texas by United States Border Patrol, and charged with Unlawful Entry, in violation of 8 U.S.C. § 1325. MEDINA-SANCHEZ pleaded guilty and was sentenced to 30 days' custody.
8. On or about November 26, 2019, MEDINA-SANCHEZ was arrested by ICE ERO-Detroit following an execution of a search warrant approved by the Honorable U.S. Magistrate Judge R. Steven Whalen, U.S. District Court, Eastern District of Michigan, Southern Division. MEDINA-SANCHEZ was processed as a reinstate and served with an I-871 Notice of Intent/Decision to Reinstate a Prior Order. MEDINA-SANCHEZ was removed from the United States to Mexico on March 31, 2020, at Brownsville, Texas.
9. On or about January 15, 2025, through document analysis performed by Detroit Sector Intelligence Unit (DTM IU) it appeared MEDINA-SANCHEZ may be living in the Detroit, Michigan area. Document analysis of sensitive financial reporting indicates MEDINA-SANCHEZ is likely present in the United States, and it is probable that he returned to the United States within months of being removed in 2020. Those transactions were made at a business which is approximately a mile from 4820 Toledo Street in Detroit, MI 48209. The address at 4820 Toledo Street is the same location where ICE ERO found MEDINA-SANCHEZ during the execution of a federal search warrant. Additionally, MEDINA-SANCHEZ has a family member at the 4820 Toledo Street address in Detroit, MI 48209, who is currently co-registered with him on a Silver, 2016 Chevrolet Silverado, Michigan Lic. Plate DTG6781.
10. On or about January 23, 2025, Affiant observed MEDINA-SANCHEZ exit the front door of 4820 Toledo Street in Detroit, MI 48209. Affiant was able to clearly and positively identify MEDINA-SANCHEZ from his

surveillance location. Affiant compared the male seen exiting the 4820 Toledo address to past arrest photos of MEDINA-SANCHEZ, which resulted in a positive identification. The 4820 address on Toledo Street is the same location where ICE ERO found MEDINA-SANCHEZ during the execution of a federal search warrant in November of 2019.

11. Review of the Alien File (A# xxx xxx 341) for Gamaliel MEDINA-SANCHEZ and queries in Department of Homeland Security databases confirm no record exists of MEDINA-SANCHEZ obtaining the express permission from the Attorney General or the Secretary of the Department of Homeland Security to re-apply for admission to the United States following his removal on March 31, 2020.
12. Based on the above information, I believe there is probable cause to conclude that, Gamaliel MEDINA-SANCHEZ is an alien, who was found in the United States after removal, without the express permission from the Attorney General of the United States or from the Secretary of the Department of Homeland Security to re-apply for admission into the United States in violation of Title 8, United States Code, Section 1326(a).



Brian Cox, Border Patrol Agent
U.S. Department of Homeland
Security

Subscribed and sworn to before me and signed in my presence and/or by reliable electronic means.



Honorable Kimberly Altman
United States Magistrate Judge

Dated: January 27, 2025